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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

Brandon Burns (President of Freedom of Choice 501c3)
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 Pro Se

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 Pro Se

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

BRANDON BURNS, SHARELLE
 MENDENHALL, 18 MINORS BY AND
 THROUGH THEIR PARENTS, WENDY PRICE,
 AMY MCKAY, TINA SPENDLOVE, KELLY
 CAMPIS, LAZARO CAMPIS, ANDREA
 MILLER-PEWSEY, WALTER MATUSZYK,
 LEIGH MADDOX, KATIE PARNCUTT,
 DEANNA GLAZA, BRIAN COOK AND
 BONNIE TAYLOR

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT, BOARD
 OF EDUCATION; DR JESUS F. JARA, IN HIS
 INDIVIDUAL CAPACITY AND IN HIS
 OFFICIAL CAPACITY AS SUPERINTENDENT
 OF THE CLARK COUNTY SCHOOL DISTRICT;
 AND LINDA P. CAVAZOS, IRENE A. CEPEDA,
 EVELYN GARCIA MORALES, LOLA BROOKS,
 DANIELLE FORD, LIZA GUZMAN, AND
 KATIE WILLIAMS, ALL IN THEIR
 INDIVIDUAL CAPACITIES AND IN THEIR
 CAPACITIES AS MEMBERS OF THE CLARK
 COUNTY SCHOOL DISTRICT BOARD OF
 EDUCATION,

Defendants,

Case No.: **2:21-cv-01725-BNW**

COMPLAINT

COMPLAINT

This is a civil action seeking monetary relief for violations of Nevada Revised Statutes, Nevada Constitutional, U.S. Constitutional, and federal civil rights laws.

Plaintiff hereby alleges the following:

Plaintiffs, Brandon Burns, Sharelle Mendenhall, p.m. 18 minors, by and through their parents, Wendy Price, Amy Mckay, Tina Spendlove, Kelly Campis, Lazaro Campis, Andrea Miller-Pewsey, Walter Matuszyk, Leigh Maddox, Katie Parncutt, Deanna Glaza, Brian Cook and Bonnie Taylor, *pro se*, hereby file this complaint against Defendants, Clark County School District Board of Education ("school board"); Dr. Jesus F. Jara, in his individual capacity and in his official capacity as Superintendent of the Clark County School District; and Linda P. Cavazos, Irene A. Cepeda, Evelyn Garcia Morales, Lola Brooks, Danielle Ford (only in her capacity as member of the school board), Liza Guzman, and Katie Williams, all in their individual capacities, and in their capacities as members of the Clark County School District Board of Education all individual elected officials sued in their individual capacity and in their capacity as members of the school board (collectively, "defendants"). In support of the claims set forth herein, plaintiffs allege and aver as follows:

JURISDICTION AND VENUE

1. Plaintiffs incorporate the foregoing paragraphs as if set forth in full herein.
2. This Court has subject matter jurisdiction over Plaintiffs' claims under 28 U.S.C. §1331, 28 U.S.C. §§1343(a)(3), (4), 28 U.S.C. §1367, 28 U.S.C. § 2201, and 42 U.S.C. §1983.
3. There exists an actual and justiciable controversy between Plaintiffs and Defendant requiring resolution by this Court.

1 4. Defendant Dr. Jesus F. Jara was at all relevant times the Superintendent of the
2 Clark County School District; in that capacity, acting under color of law, he is responsible for
3 the implementation of all official governmental laws, policies, regulations and procedures
4 governing the Clark County School District. He is sued in his official and individual capacities.
5

6 5. Defendant Linda P. Cavazos is a Clark County resident and member of the
7 School Board, sued here in her individual and representative capacity. Mrs. Cavazos is
8 currently the President of the School Board.

9 6. Defendant Irene A. Cepeda is a Clark County resident and member of the
10 School Board, sued here in her individual and representative capacity. Mrs. Cepeda is currently
11 the Vice President of the School Board.
12

13 7. Defendant Evelyn Garcia Morales is a Clark County resident and member of the
14 School Board, sued here in her individual and representative capacity.

15 8. Defendant Lola Brooks is a Clark County resident and member of the
16 School Board sued here in her individual and representative capacity.
17

18 9. Defendant Danielle Ford is a Clark County resident and member of the School
19 Board, sued in her representative capacity only.

20 10. Defendant Liza Guzman is a Clark County resident and member of the School
21 Board, sued here in her individual and representative capacity.
22

23 11. Defendant Katie Williams is a Clark County resident and member of the School
24 Board, sued here in her individual and representative capacity.

25 12. At all relevant times hereto, the School Board and the individual Defendants
26 were acting under color of state law.

27 ///

28 COMPLAINT - 4

FACTS

Plaintiffs incorporate the foregoing paragraphs as if set forth in full herein.

A. Clark County School District Board of Education

1. Plaintiffs incorporate the foregoing paragraphs as if set forth in full herein.

2. The Clark County School District Board of Education is “composed of 7 citizens who are representatives of the residents of Clark County School District. Board members are elected ‘at large’ on a nonpartisan ballot and serve for staggered terms of four years.” <https://ccsd.net/trustees/details/B>. The seven individuals currently serving as School Board Members are Defendants.

3. This seven-member School Board unanimously appointed Defendant Dr. Jesus F. Jara to serve as Superintendent of Schools, effective June 2018.

4. As Superintendent, Dr. Jara is charged with the administration of the CCSD and is a Defendant.

B. Relevant Facts of the Clark County School District Board of Education

The primary responsibility of the Board is to establish purposes, programs and procedures which produce the educational achievement needed by District students. The Board must accomplish this while also being responsible for wise management of resources available to the District. The Board must fulfill these responsibilities by functioning primarily as a legislative body to formulate and adopt policy, by selecting an executive officer to implement policy and by evaluating the results; further, it must carry out its

1 functions openly, while seeking the involvement and contributions of the public, students,
2 and staff in its decision-making processes.

3
4 In accordance with these principles, the Board should seek to achieve the following
5 goals to:

- 6 1. Formulate Board policies which best serve the educational interests of each
7 student
- 8 2. Maintain effective communication with the school community, the staff, and the
9 students in order to maintain awareness of attitudes, opinions, desires, and ideas
- 10 3. Conduct Board business openly, soliciting and encouraging broad-based
11 involvement in the decision-making process by public, students, and staff
12

13
14
15 **U.S. and Nevada Constitutions and Nevada Revised Statutes**

16 NRS 391.080 requires each licensed employee employed in the State of Nevada whose
17 compensation is payable out of public money to take and subscribe to the “constitutional oath
18 of office” before entering upon the discharge of his duties.

19 *I, (state name), do solemnly swear (or affirm) that I will support, protect and defend the*
20 *constitution and government of the United States and the constitution and government of the*
21 *State of Nevada against all enemies, whether domestic or foreign; that I will bear true faith,*
22 *allegiance and loyalty to the same, and ordinance, resolution or law of any state*
23 *notwithstanding; and that I will well and faithfully perform all the duties of the office of or*
24 *position on which I am about to enter: (if an oath) so help me God; (if an affirmation) under*
25 *the pains and penalties of perjury”*
26
27
28

1 This oath describes the sworn testimony of each CCSD School Board members
2 obligation to the U.S. and Nevada Constitutions. These oaths and sworn testimony have been
3 violated and the Defendants should be held accountable for the following violations:
4

5
6 **FIRST CAUSE OF ACTION**

7 **COUNT I - 42 U.S.C. §1983 - Violation of Procedural Due Process (5th and 14th**
8 **Amendments) - Against All Defendants**

- 9 1. Plaintiffs incorporate the foregoing paragraphs as if set forth in full herein.
- 10 2. In order establish a claim under section 1983 of the Civil Rights Act, a Plaintiffs
11 must prove a Defendant: (a) acted under the color of state law; (b) proximately causing; (c) the
12 Plaintiffs to be deprived of a federally protected right. 42 U.S.C. §1983.
- 13 3. In the instant case, Defendants unquestionably acted under the color of state
14 law.
- 15 4. Each Individual Defendant is an elected, voting member of the Clark County
16 School District Board of Education with the exception of Defendant Dr. Jesus F. Jara, who is
17 the Superintendent of the Clark County School District.
- 18 5. Under the Fifth Amendment to the Constitution, no person may be deprived of
19 life, liberty, or property without due process of law. U.S. Const. Ann., Amendment V.
- 20 6. The Fourteenth applies the protections of the Fifth Amendment to state actors.
21 U.S. Const. Ann., Amendment XIV.
- 22 7. Plaintiffs children have constitutionally protected interests in the benefits that
23 come from them not being subject to the Board's mask mandate, including the ability to pursue
24

1 an education without being subjected to health risks that are not offset by any scientifically
2 provable benefits.

3 8. Defendants have enforced a “mandate” that has not been passed by the State of
4 Nevada Legislative Branch and is not enforceable by law. Mandates, Requirements, Demands,
5 Policies, Recommendations etc. are NOT law, nor does the Clark County School District
6 Board have legislative authority to create such laws, policies, mandates or requirements that
7 violate U.S. and Nevada Constitutions, Federal Civil Law and Nevada Revised Statutes against
8 the will of the People of Nevada or their minor children.
9

10 9. Defendants’ implementation of the mask policy unlawfully deprives Plaintiffs
11 of these and other constitutionally protected interests without due process of law. Such
12 deprivation occurred with no notice or meaningful opportunity to be heard as the
13 Superintendent instated the mask mandate prior to offering an opportunity for public
14 discussion, deferring back to the County Commissioners who deferred back to the school board
15 which was conducted in no way compliant with the due process of law. Such deprivation was
16 arbitrary, capricious, based on ignorance without inquiry into facts, and in violation of the
17 School Board’s own policies and other applicable laws. Such deprivation violates the Fifth and
18 Fourteenth Amendments of the Unites States Constitution.
19

20 10. Plaintiffs children were harmed and continue to be irreparably harmed by these
21 unlawful acts, including but not limited to, by suffering an overall possible simultaneous drop
22 in oxygen saturation of the blood and increase in carbon dioxide, which contributes to an
23 increased noradrenergic stress response, with heart rate increase and respiratory rate increase
24 and, in some cases, a significant blood pressure increase. (See Exhibits 1).
25
26
27
28

SECOND CAUSE OF ACTION

COUNT II - 42 U.S.C. §1983 - Violation of Substantive Due Process (Fourteenth Amendment) – Against All Defendants

1. Plaintiffs incorporate the foregoing paragraphs as if set forth in full herein.

2. In order establish a claim under section 1983 of the Civil Rights Act, a Plaintiffs must prove a Defendant: (a) acted under the color of state law; (b) proximately causing; (c) the Plaintiffs to be deprived of a federally protected right. 42 U.S.C. §1983.

3. In the instant case, Defendants unquestionably acted under the color of state law.

4. Each individual Defendant is an elected, voting member of the Clark County School District Board of Education with the exception of Defendant Dr. Jesus F. Jara, who is the Superintendent of the Clark County School District.

5. Under the Fourteenth Amendment to the Constitution, and as established by state law including the state created danger doctrine, Plaintiffs have a fundamental right to a public education and to an education in a safe and healthy environment.

6. Plaintiffs were harmed and continue to be irreparably harmed by these unlawful acts, including but not limited to, by suffering an overall possible simultaneous drop in oxygen saturation of the blood and increase in carbon dioxide, which contributes to an increased noradrenergic stress response, with heart rate increase and respiratory rate increase and, in some cases, a significant blood pressure increase.

7. Plaintiffs have constitutionally protected interests in the benefits that come from them not being subject to the Board's mask mandate, including the ability to pursue an

1 education without being subjected to forced health risks that are not offset by any scientifically
2 provable benefits.

3 8. Defendants' implementation of the mask policy unlawfully deprives Plaintiffs
4 of these and other constitutionally protected interests without due process of law. Such
5 deprivation occurred with no notice or meaningful opportunity to be heard as the
6 Superintendent instated the mask mandate prior to offering an opportunity for public
7 discussion. Such deprivation was arbitrary, capricious, based on ignorance without inquiry into
8 facts, and in violation of the School Board's own policies and other applicable laws.
9
10

11
12 9. A new study involving over 25,000 school-aged children, shows that masks are
13 harming schoolchildren physically, psychologically, and behaviorally, revealing 24 distinct
14 health issues associated with wearing masks. The health issues and impairments observed in
15 this study were found to affect 68% of masked children who are forced to wear a face covering
16 for an average of 4.5 hours per day. The study also includes 17,854 health complaints
17 submitted by parents. Some of the health issues found in the study include: increased
18 headaches (53%), difficulty concentrating (50%), drowsiness or fatigue (37%), malaise (42%),
19 and nearly a third of children experience more sleep issues than they had previously and a
20 quarter of children developed new fears. Though these results are concerning, the study also
21 found that 29.7% of children experienced shortness of breath, 26.4% experienced dizziness,
22 and hundreds of the participants experiencing accelerated respiration, tightness in chest,
23 weakness, and short-term impairment of consciousness. (New Study Finds COVID Masks Harm
24 Children's Physical & Mental Health | Principia Scientific Intl. (principia-scientific.com))
25
26

27 ///

THIRD CAUSE OF ACTION

COUNT III – Violation, Threats, Coercion, Willful Injury - Against All Defendants

1. NRS 205.320 Threats. A person who, with the intent to extort or gain any money or other property or to compel or induce another to make, subscribe, execute, alter or destroy any valuable security or instrument or writing affecting or intended to affect any cause of action or defense, or any property, or to influence the action of any public officer, or to do or abet or procure any illegal or wrongful act, whether or not the purpose is accomplished, threatens directly or indirectly:

1. To accuse any person of a crime;
2. To injure a person or property;
3. To publish or connive at publishing any libel;
4. To expose or impute to any person any deformity or disgrace; or
5. To expose any secret,

is guilty of a category B felony and shall be punished by imprisonment in the state prison for a minimum term of not less than 1 year and a maximum term of not more than 10 years, or by a fine of not more than \$10,000, or by both fine and imprisonment. In addition to any other penalty, the court shall order the person to pay restitution.

Pursuant to NRS 205.320 (2), Defendants have unlawfully forced and compelled all minor Plaintiffs, parents and/or guardians to subscribe to an action by purposefully threatening to injure CCSD students by forcing children to wear a mask the entirety of their attendance on CCSD properties that has been scientifically proven to be hazardous to children's health, willfully causing physical and/or psychological injury. Furthermore, threatening to remove the rights of the children to attend public school if they do not comply also violates NRS 205.320

1 by forcefully removing a child's freedoms for academic instruction, participation in public
 2 school and irreversibly causing damage to their future potential education and academic
 3 aptitudes potentially resulting in future economic damage by limiting their abilities to excel in a
 4 workforce due to limited education opportunities.
 5

7 **FOURTH CAUSE OF ACTION**

8 **COUNT IV – Violation, United States 18 USC 245 Federally Protected Activities -** 9 **Against All Defendants**

10 1. **18 USC 245** describes the following as federally protected activities:

- 11 a. Protection of participating in or enjoying any benefit, service, privilege,
 12 program, facility, or activity provided or administered by the United States.
- 13 b. Protection of participating in or enjoying the benefits of any program or activity
 14 receiving Federal financial assistance.
- 15 c. Protection of any person because of his race, color, religion or national origin
 16 and because he is or has been enrolling in or attending any public school or
 17 public college; or participating in or enjoying any benefit, service, privilege,
 18 program, facility or activity provided or administered by any State or
 19 subdivision thereof.
 20
 21

22 The Defendants, nor has any Court proven that the use of masks while attending public
 23 school provides any scientifically measurable protection of spread for any diseases nor do any
 24 of manufacturers of the masks being worn claim any kind of protection from or against any
 25 disease, specifically airborne. As a matter of fact, any and all the masks currently "approved"
 26 by CCSD to be worn have manufacturer warnings stating specifically that it **DOES NOT**
 27
 28

1 provide protect from or against the spread of any diseases. The decision to forcibly mandate
 2 that the children wear the masks or lose their right to attend public school is a blatant violation
 3 of these federally protected activities.

4 **FIFTH CAUSE OF ACTION**

5 **COUNT V – Violation, United States; 42 USC §1983 - Against All Defendants**

6
 7 1. **United States; 42 USC §1983** provides that every person who, under color of any
 8 statute, ordinance, regulation, custom, or usage, of any State or Territory or the District
 9 of Columbia, subjects, or causes to be subjected, any citizen of the United States or other
 10 person within the jurisdiction thereof to the deprivation of any rights, privileges, or
 11 immunities secured by the Constitution and laws, shall be liable to the party injured in an
 12 action at law, suit inequity, or other proper proceeding for redress.

13
 14 2. Defendants have enforced illegally established “policies” and rules within all CCSD
 15 public schools depriving the rights and privileges of Plaintiffs with willful intent to cause
 16 bodily injury. The Plaintiffs have and continue to be irreparably harmed by these unlawful
 17 acts. The Defendants DO NOT have the legislative authority to enforce mandates or policies
 18 that directly violate constitutional and federal laws. There has been no “law” established
 19 Nevada therefore, CCSD School Board has no authority enforce such hazardous to health
 20 “policies”.
 21

22 **SIXTH CAUSE OF ACTION**

23 **COUNT VI – Failure to respond to a DEMAND FOR RELIEF** submitted by Plaintiff

24
 25 Bonnie Taylor, served to Superintendent Dr. Jesus F. Jara and School Board Trustees (All) on
 26 August 12, 2021 on behalf of all the People of the State of Nevada, fulfilling this Courts Rules
 27

1 of Procedure in regards to the expectation of Demands for Relief to be made prior to initiating
2 litigation. (See Exhibit 2)

3 Exhibit 2 has been served and Notice has been given to the CCSD
4 School Board. Documents include Affidavit of Maladministration for not performing their
5 oath as an elected official of office and violating the Nevada and US Constitution. Notice of
6 violation of NRS codes NRS 200.471 and NRS 205.320.
7

8 There has been outrage for the violation of our constitutional rights. CCSD
9 employees and CCSD parents have spoken out at board meetings requesting masks mandates
10 to be dropped. There is full video documentation on the CCSD website, www.ccsd.net
11

12 The President of the School Board, Linda Cavazos, has opening given veiled
13 threats to those who are speaking at the board meetings including call them wannabe-
14 insurrectionist. She has also threatened to stop the meeting for not complying to the mandate
15 which violates our constitutional rights. People have been removed and/or denied their first
16 amendments rights to speak at the board meetings due to the nature of Linda Cavazos
17 dictatorship during the meetings.
18

19 20 CONCLUSION

21 The Defendants (public servants) have blatantly and maliciously violated the Nevada
22 and U.S. Constitutions, Nevada Revised Statutes and federal civil laws with willful
23 premeditative intent. The Defendants have abused their authority by creating Nevada "Law"
24 with forced mask use in public schools with no legislative authority to do so. These public
25 employees and servants should face severe consequences for violating the public's trust with
26 penalties of no less than a Class C Felony including a term of imprisonment between 1 and 5
27
28

1 years, and fine of not more than \$10,000, or both. (re Nev. Rev. Stat. Ann § 193.130. They
 2 should face permanent removal from office, and permanent disqualification from holding any
 3 state position ever in the future. In addition, Plaintiffs seek restitution in the amount of
 4 \$200,000,000.00 for purposefully, willfully endangering the physical, psychological and
 5 emotional health of the Plaintiffs children, violating the Plaintiffs U.S. and Nevada
 6 constitutional rights, threatening loss of enjoyment of federal civil rights of freedom of
 7 education if they do not agree to risking their health and lastly purposeful violation of Nevada
 8 Revised Statutes by threatening the Plaintiffs with intent to cause emotional, physical and
 9 psychological harm in addition to threats of tangible lifelong negative consequences by
 10 forbidding Plaintiffs children academic and future economic success by removing them from
 11 attending public school if they do not comply and accept the physical harm perpetuated by
 12 CCSD.
 13
 14

15 **RESERVATION OF RIGHTS**

16 Plaintiffs herein expressly reserve their rights in regards to any additional
 17 claims to which they may be entitled under federal law as well as under the laws of the State of
 18 Nevada, including claims arising from any violations of Nevada's Open Meetings Laws or
 19 other actions of misconduct that may have been committed by Defendants. Plaintiffs expressly
 20 place Defendants on notice of Plaintiffs' intention to initiate removal proceedings at the state
 21 court level against Defendants as a result of the infractions Defendants have committed, as
 22 described herein.
 23
 24

25 **PRAYER FOR RELIEF**

26 **WHEREFORE**, Plaintiffs request that the Court grant the following relief:

- 27 a. Assume jurisdiction of this action;
 28

- b. Vacate and set aside the Defendants' mask mandate as well as any other action taken by Defendants to institute the mask mandate and implement the provisions of the mask policy;
- c. Declare that the Defendants' masking policy is void and without legal force or effect;
- c. Declare that the institution of the mask policy and actions taken by Defendants to implement the mask policy are arbitrary, capricious, based on ignorance due to failure to inquire into facts, otherwise not in accordance with law, and without observance of required procedures;
- d. Declare that the mask policy and the actions taken by Defendants to implement the mask policy are in violation of the Constitution and contrary to the laws of the United States and the State of Nevada;
- e. Temporarily restrain, as well as preliminarily and permanently enjoin Defendants, their agents, servants, employees, attorneys, and all persons in active concert or participation with any of them, from implementing or enforcing the mask policy and from taking any other action to implement the masking policy that is not in compliance with applicable law; and
- f. Each Defendant held accountable for violating the public's trust to the fullest extent of the law of no less than category C Felony.
- g. Restitution to Plaintiffs in the amount of \$200,000,000.000
- h. Grant such other and further relief as may be just, equitable, and proper including without limitation, an award of any and all litigation fees, time and travel fees as well as compensatory and punitive damages to Plaintiffs.

Submitted by:

Wendy Price
6821 Sleepy Forest
LV. NV 89130

Signature(s):



Dated:

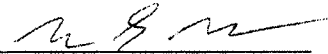
9/20/21

VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 17th day of (month) SEPTEMBER, 2021.

Submitted By: (your signature) 

Print Name: BRANDON BURNS

Address: 6712 DIVERS LOONS ST, NORTH LAS VEGAS, NV 89084

Email: FREEDOM OF ACT NOICE LV@gmail.com

VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 17 day of (month)
September, 2021.

Submitted By: (your signature)

Sharelle Mendenhall

Print Name:

Sharelle Mendenhall

Address:

472 Olympic Outlook Dr. NV 89411

Email:

Sharelle8@yahoo.com

VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 19 day of (month) September, 2021.

Submitted By: (your signature) _____

Print Name: _____

Address: 6821 Sleepy Pine St LV, NV 89130

Email: WPRICE1000@yahoo.com

I, the undersigned, being a resident of the State of Nevada, do hereby certify that the foregoing is a true and correct copy of the original as the same appears in the records of the State of Nevada.

Witness my hand and the seal of the State of Nevada at the City of Reno, this 17th day of September, 2021.

2020-09-17 17:00 day of September, 2021

Submitted By: (your signature)

Amy McKay

Print Name: Amy McKay

Address: 6224 Lanning Lane Las Vegas NV

E-mail: amckay00@gmail.com

VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 17 day of (month) September, 2021.

Submitted By: (your signature) Tina Spendler

Print Name: Tina Spendler

Address: 5908 Pearl's Way Ct NLV NV 89081

Email: tispender1@protonmail.com

VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 17 day of (month) September 2021.

Submitted By: (your signature) Andrea Miller-Pausa

Print Name: Andrea Miller-Pausa

Address: 1207 San Gabriel Ave Henderson, NV 89002

Email: AndreaMiller05@yahoo.com

VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

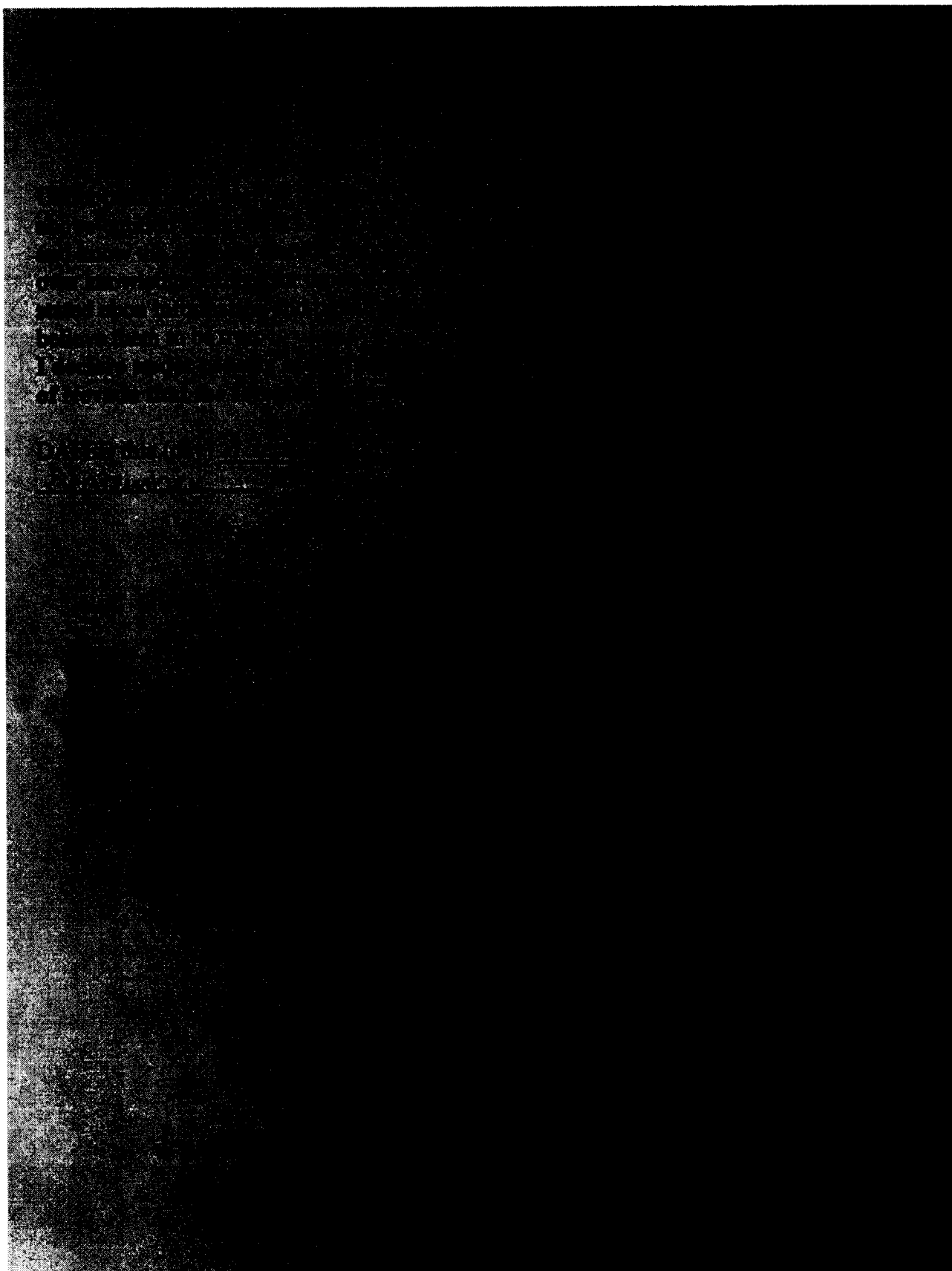
I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 19 day of (month) September, 2021.

Submitted By: (your signature)

Print Name:

Walter Matusyk
Walter matusyk
Address: 5334 Reed Station St NLV, NV 89031
Email: WPrice1000@yahoo.com



VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 17 day of (month) September, 2021.

Submitted By: (your signature) Katie Parnett

Print Name: Katie Parnett

Address: 1961 Red Sand Ct. Henderson, NV 89002

Email: K8Eann12@gmail.com

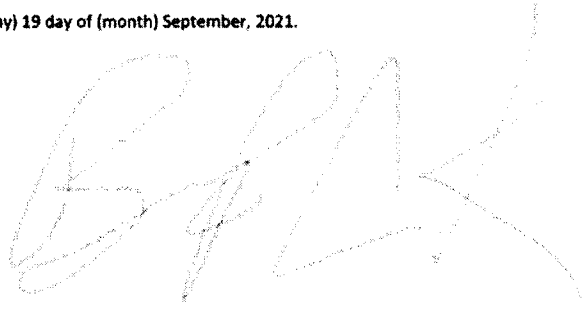
VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 19 day of (month) September, 2021.

Submitted By:

A handwritten signature in black ink, appearing to read 'Brian Cook', is written over a large, faint, dotted rectangular area.

Brian Cook

6836 Arcadia Creek St, North Las Vegas, NV. 89131

brian@empoweringhumans.com

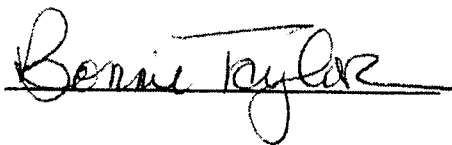
VERIFICATION

Under penalties of perjury, I declare that I am a Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this (day) 19 day of (month) September, 2021 .

Submitted By: (your signature)

A handwritten signature in cursive script, appearing to read "Bonnie Taylor", written over a horizontal line.

Print Name: Bonnie Taylor

Address: 2161 Madison Heights Street

Henderson, NV 89052

Email: taylorbon@gmail.com